

August 31, 2004

Case Control Unit, Chief  
Surface Transportation Board  
1925K Street NW  
Washington, D.C. 20423  
Attention: Ms. Phillis Johnson-Ball



21  
1004  
P.J.

Dear Ms. Johnson-Ball:

RE: OLIN CORPORATION  
51 Eames Street, Wilmington, MA  
STB Filing (New England Transrail)  
Finance Docket # 34, 391

PUBLIC COMMENT PERIOD  
by 9/3/04

While I am no expert, my feeling of "environmental justice" would be that "no community – regardless of income (good or bad) should have to suffer more than their fair share of environmental impacts than any other area (census track) in protection of public health; and that the protection of public health (and the health-care system) should take first priority.

As you note and are aware, the air quality is already poor in the county due to vehicles, industries, and locomotives and "serious". Maybe more so in our community. This proposed action is an added "assault" to the residents who helplessly have had little control over the "cumulative" toxins in this area from current land use of industry and releases allowed to be emitted into the air. The history is clear.

\*Cumulative Air Quality Testing should be ***independently done*** to determine any detriment to the public, specifically in this South Wilmington Industrial area.

For the Global warming issue, several companies in South Wilmington have been targeted by the EPA.

.....Only with a factual full-scale testing can you know what any added toxic concentrations from the proposed action would result in, and whether it would be safe.

\*Traffic does not flow freely throughout the area – there are many failed intersections.

The proposed 400 trucks a day added with the addition of a rail line; and then adding a land-use of this magnitude is incomprehensible for our suburban town that is still rich in natural resources and people.

\*Woburn Street is zoned "residential" with "school Bus stops" for area children.

\*There is no buffer zone between this industrial area and residents in direct proximity.

\*Noise issues from this proposal will degrade the quality of life for area residents.

\*Seismic activity is known to influence migrations of contaminants. Further migrations of contaminants would further degrade the surrounding ecosystem. ....with billions of gallons of chromium in the ground, an operation of this magnitude is detrimental.

NDMA is the contaminant identified that closed our drinking water wells (temporarily we hope). Country-wide millions of dollars have been spent in identifying transport and fate of this contaminant – a class of nitrosamines for treatment.

\*Proposed actions at this site will, and has, ultimately *impacted areas within and beyond the site*; and the state has now turned this site over to the EPA's National Priority List because Olin has been unwilling to deal faithfully with the DEP (MA Department of Environmental Protection Agency) and meet its obligations.

Olin is known country-wide & for its role in original "Superfund" through its court empowered legislation for "those that do not fulfill their obligations for protecting public health or the environment".

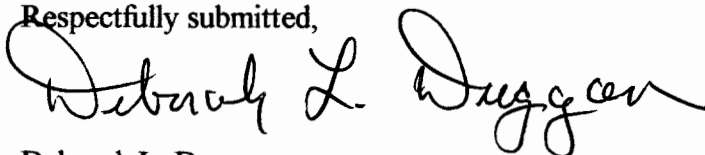
\*From a simple google-search ~ Olin is also in the rail car business.

\*This contaminated site is of such magnitude that the DEP has divided it into sections for clean up; in dividing the site into 5 sections, remember each area will impact the other And – no RAM in part for the "site as a whole" should be used for re-development. **The site in its "entirety/cumulatively" must be looked at prior to accepting any development proposal**. *Hence the need for an environmental impact report both on and off property caused from this location; and what will truly improve, and protect conditions for the health of our community and beyond.*

\*There is a "fault" located on the site (or pathway if you will) called "Bloody Bluff's Fault". If this project is not scrutinized with the utmost optimal action you can take and denied, blood may be on all our hands.

Healthy communities make for a healthy commonwealth, and a safer health-care system.

Respectfully submitted,



Deborah L. Duggan  
Credited by DEP for identifying NDMA (and treatment)  
11 Hillcrest Street  
Wilmington, MA 01887  
(978)657-7127

*Enclosure: DEP request to EPA - for this record.*



**COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

**MITT ROMNEY**  
Governor

**KERRY HEALEY**  
Lieutenant Governor

**ELLEN ROY HERZFELDER**  
Secretary

**ROBERT W. GOLLEDGE, Jr.**  
Commissioner

August 23, 2004

U.S. Environmental Protection Agency  
Region 1 – New England  
1 Congress Street  
Boston, MA 02114-2023

RE: Wilmington  
Olin Chemical  
51 Eames Street  
RTN 3-0471  
Initiation of National Priorities Listing Process

ATTN: Nancy Smith

Dear Ms. Smith:

The Massachusetts Department of Environmental Protection (DEP) wishes to initiate the process of listing the Olin Chemical Site in Wilmington, MA as a National Priorities List (NPL) site. DEP feels that the NPL listing is necessary and appropriate at this time because DEP has been unable to reach an agreement with Olin Corporation on a strategy to aggressively clean up the extensive groundwater contamination at the site, which has resulted in the closure of 5 public water supply wells in the Town of Wilmington's Maple Meadow Brook Aquifer. DEP believes that the NPL listing is the best way to ensure that the most effective cleanup technologies available are applied in a timely manner to attempt to remediate the Olin site, in light of the complexity, cost, and resources that will be necessary to complete this project.

If you have any questions regarding this letter, or there any ways that DEP can help to facilitate this process, please contact Christopher Pyott at (617) 654-6654 or at the letterhead address.

Very truly yours,

**Stephen M. Johnson**  
Section Chief  
Site Management

**cc via e-mail:**

Wilmington, Chairman of the Community Advisory Panel, Attn: Jeff Hull  
Wilmington Conservation Commission, Attn: Robert J. Douglas  
Wilmington Board of Health, Attn: Greg Erickson  
Wilmington Water Department, Attn: Mike Woods  
Geolnsight, Inc., 319 Littleton Road, Suite 100, Westford, MA 01886, Attn: Michael Webster  
Jack Fralick, Board of Health, City Hall, 10 Common Street, Woburn, MA 01801  
DEP/NERO/Water Supply, Attn: Jim Persky

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

DEP on the World Wide Web: <http://www.state.ma.us/deo>

**Wilmington – Olin Chemical  
Initiation of National Priorities Listing Process**

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DEP/Boston/Legislative Liaison: Marc LaPlante

Olin Corporation, P.O. Box 248, Charleston, TN 37310

Attn: Stephen Morrow

Sleeman, Hanley & DeNitto, 50 Congress Street, Boston, MA 02109

Attn: Margret Hanley

MACTEC Engineering and Consulting, 107 Audubon Road, Wakefield, MA 01880

Attn: Michael Murphy

Foley, Hoag & Eliot LLP, 155 Seaport Boulevard, Boston, MA 02210

Attn: Laurie Burt

Kathleen & Winifred Barry, 14 Powder House Circle, Wilmington, MA 01887

Senator Bruce Tarr, Room 507, State House, Boston, MA 02133

Rep. James Miceli, Room 167, State House, Boston, MA 02133

Rep. Charles Murphy, Room 166, State House, Boston, MA 02133

Rep. Carol Donovan, Room 473-B, State House, Boston, MA 02133

**cc via mail:**

DEP/Data Management: C&E/INTLET

Chairman, Board of Selectmen, 121 Glen Road, Wilmington, MA 01887

Mayor John Curran, City Hall, 10 Common Street, Woburn, MA 01801

Public Library, 175 Middlesex Avenue, Wilmington, MA 01887

Attn: Olin Site Repository